

STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION

Z-TEL COMMUNICATIONS, INC.	}	
	}	
Complainant	}	
	}	
vs.	}	Docket No. 02-0160
	}	
ILLINOIS BELL TELEPHONE COMPANY, d/b/a AMERITECH ILLINOIS	}	
	}	
Respondent	}	

SUPPLEMENTAL RESPONSE OF ILLINOIS BELL TELEPHONE COMPANY  
TO REQUEST FOR EMERGENCY RELIEF

Illinois Bell Telephone Company (“Ameritech Illinois”) submits this supplemental response to Z-Tel Communications, Inc.’s (“Z-Tel’s”) request for emergency relief pursuant to Section 13-515(e) of the Public Utilities Act (“Act”). In its request for emergency relief, Z-Tel requests the Commission to “enter an order enjoining Ameritech from either soliciting Z-Tel customers that switch from Ameritech or from offering through any other means (such as telemarketing or channel sales representatives) ‘Winback’ offering, until such time as Ameritech provides Z-Tel with identical Line Loss Notification that Ameritech provides to its retail operations.” (emphasis supplied) Complaint, Par. 52.

The 836 Line Loss Notification process provides line loss information to Z-Tel and other CLECs that is directly comparable to the information received by Ameritech Illinois’ retail operations. However, Z-Tel alleges that delays and inaccuracies in Line

Loss Notifications sent to Z-Tel result in Z-Tel receiving line loss information that is inferior to the information provided to Ameritech Illinois' retail operations.

Ameritech Illinois has acknowledged problems with the Line Loss Notification process. However, an SBC Ameritech cross-functional team has been working intensively over the past several weeks to identify and resolve the issues that have caused the alleged delays and inaccuracies. Those efforts are more fully described in the attached affidavit of Glen Sirles, who heads the cross-functional team. As described by Mr. Sirles, Ameritech Illinois believes that Z-Tel now receives notice of nearly all of its line losses within five days of the loss. As further described by Mr. Sirles, the cross-functional team will continue its intensive efforts until the line loss notification process is working efficiently and complies with applicable standards.

Until these further improvements have been implemented or alternative means are devised to provide CLECs with comparable line loss information, Ameritech Illinois will modify its Winback marketing activities to reflect concerns expressed by Z-Tel. As described in the attached affidavit of David V. Banks, Ameritech Illinois will delay the initial contact letter to customers who switch from Ameritech Illinois' local service by an additional two days beyond the existing intervals. Furthermore, Ameritech Illinois will delete any marketing language from the initial contact letter. These commitments will apply to all CLECs in Illinois and to all customers in Illinois (residence and business), and will remain in effect until (1) the problems identified in the Line Loss Notification process have been resolved, or (2) other means are identified to provide CLECs with information equivalent to that received by Ameritech Illinois' retail operations.

Ameritech Illinois respectfully submits that with the progress that has been made in eliminating the inaccuracies and delays complained of by Z-Tel, as described by Mr. Sirles, and with the modifications Ameritech Illinois hereby commits to make in its Winback marketing activities, as described by Mr. Banks, the draconian relief requested by Z-Tel, which would totally preclude Winback marketing activities by Ameritech Illinois, is unreasonable and unnecessary and would not be in the public interest.

WHEREFORE, for the reasons stated in this Supplemental Response and in Ameritech Illinois' initial response, Ameritech Illinois respectfully requests that Z-Tel's request for emergency relief be denied.

Respectfully submitted,

Illinois Bell Telephone Company  
(Ameritech Illinois)

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### Certificate of Service

The undersigned, an attorney, certifies that he served a copy of this Supplemental Response of Illinois Bell Telephone Company to Request for Emergency Relief on each person on the attached Service List by electronic mail or hand delivery on February 27, 2002.

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Service List Docket 02-0160

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